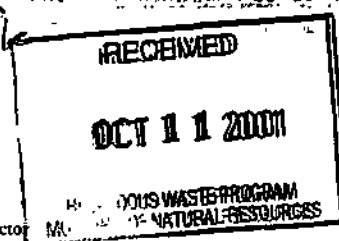




DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

Bob Holden, Governor • Stephen M. Mahood, Director



October 10, 2001

CERTIFIED MAIL 7099 3220 0009 3713 2658
RETURN RECEIPT REQUESTED

Mr. Jeffrey Zelms, President
The Doe Run Resources Corporation
d/b/a/ the Doe Run Company
1801 Park 270 Drive, Suite 300
St. Louis, MO 63146

Site: Herculaneum
ID# MO0006266372
Break: 1.0
Other: _____
10-10-01

A717

Dear Mr. Zelms:

On August 21, 2001, Dave Mosby, of the Missouri Department of Natural Resources' Hazardous Waste Program collected a sample of street dust along Doe Run haul roads of Broad Street and Station Street in the City of Herculaneum. The purpose of this investigation was to determine if contaminants were leaving trucks traveling to and from the Doe Run facility.

The results of the grab sample showed a total arsenic level of 138,000 $\mu\text{g/Kg}$, total cadmium level of 598,000 $\mu\text{g/Kg}$, total nickel level of 519,000 $\mu\text{g/Kg}$, total zinc level of 24,800,000 $\mu\text{g/Kg}$, and a total lead level of 300,000,000 $\mu\text{g/Kg}$. Discharge of these contaminants constitutes violations of the Missouri Clean Water Law Sections 644.051(1) and 644.076.1, RSMo. The enclosed Notice of Violation No. 50038 is hereby issued to enumerate these violations and to serve as your official notice that violations exist.

It is our purpose by this Notice of Violation to persuade you to take steps to eliminate the violations. If you have any questions, please contact me at (573) 751-1740.

Sincerely,

WATER POLLUTION CONTROL PROGRAM

Kevin Mohammadi for

Kevin Mohammadi, Chief
Enforcement Section

KM:sw

40173240



SUPERFUND RECORDS

Mr. Jeffrey Zelms
Page 2

Attachments

c: Daniel Schuette, Air and Land Protection Division
Gary Behrns, Hazardous Waste Program
Robert Hinkson, Hazardous Waste Program
David Mosby, Hazardous Waste Program
Shelley Woods, Attorney General's Office
Richard Laux, Water Pollution Control Program
Mohamad Alhalabi, P.E., St. Louis Regional Office



MISSOURI DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
NOTICE OF VIOLATION

P.O. BOX 176
JEFFERSON CITY, MO 65102

VIOLATION NUMBER

50038

DATE AND TIME ISSUED

October 10, 2001

☐ A.M.
☐ P.M.

SOURCE (NAME, ADDRESS, PERMIT NUMBER, LOCATION)

Doe Run Resources Corporation d/b/a The Doe Run Company

Herculaneum Smelter 881 Main St.

Herculaneum, MO 63048

MAILING ADDRESS

1801 Park 270 Drive Suite 300

CITY

St. Louis

STATE

MO

ZIP CODE

63146

NAME OF OWNER OR MANAGER

Jeffrey Zelms

TITLE OF OWNER OR MANAGER

President

LAW, REGULATION OR PERMIT VIOLATED

Missouri Clean Water Law Section 633.051 (1) and 644.076.1 RSMo

NATURE OF VIOLATION

DATE(S):

TIME(S):

On August 21, 2001 a grab sample of street dust was collected from Broad St. and Station St. in Herculaneum Mo. The results of this sample exhibited a total lead content of 300,000.00 ug/kg; total arsenic of 138,000 ug/kg; total cadmium of 598,000 ug/kg; total nickel of 519,000 ug/kg; and total zinc of 24,800,000 ug/kg.

This constitutes placing or causing or permitting to be placed water contaminants in a location where they are reasonably certain to cause pollution of waters of the state.

SIGNATURE (PERSON RECEIVING NOTICE)

SIGNATURE (PERSON ISSUING NOTICE)

Kevin Mohammadi

TITLE OR POSITION

TITLE OR POSITION/DNR REGION

Kevin Mohammadi, Chief, Enforcement Section

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Bob Holden, Governor • Stephen M. Mahood, Director

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

ENVIRONMENTAL SERVICES PROGRAM

RESULTS OF SAMPLE ANALYSES

RECEIVED

SEP 12 2001

Sample Number: 0139276
Lab Number: 01-D3529

Reported To: DAVE MOSBY
Affiliation: HWP
LDPR/Job-Project: QENRD/NJ00DORN

Report Date: 9/ 5/01
Date Collected: 8/21/01
Date Received: 8/31/01

Sample Collected by: DAVE MOSBY, HWP
Sampling Location: DOE RUN HERCULANEUM SMELTER
Sample Description: GRAB OF STREET DUST FROM BROAD &
STATION ST, HERCULANEUM, MO
County: JEFFERSON

Analysis Performed	Results	Analyzed	Method
Arsenic, Total	138,000 ug/kg	8/31/01	206.2
Cadmium, Total	598,000 ug/kg	8/31/01	200.7
Nickel, Total	519,000 ug/kg	8/31/01	200.7
Lead, Total	300,000,000 ug/kg	8/31/01	239.2
Zinc, Total	24,800,000 ug/kg	8/31/01	200.7
Arsenic, TCLP	Insufficient Sample		206.2
Cadmium, TCLP	Insufficient Sample		200.7
Lead, TCLP	Insufficient Sample		239.2

Page 2

Lab Number: 01-D3529

Sample Number: 0139276

September 5, 2001

Metals results are reported on a dry weight basis.

The analysis of this sample was performed in accordance with procedures approved or recognized by the U.S. Environmental Protection Agency.

Douglas N. Edwards

Douglas N. Edwards, Acting Director
Environmental Services Program
Division of Environmental Quality

c: FRANCES KLAHR, HWP